

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

PAUL MARAVELIAS,)	Civil No. 1:19-CV-00487(JL)
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	
JUSTICES OF THE SUPREME COURT OF NEW)	
HAMPSHIRE, et al.)	
)	
<i>Defendants.</i>)	
)	

**MOTION FOR FURTHER 48-HOUR EXTENSION OF TIME DUE TO
N.H. EMERGENCY ORDER #17 PURSUANT TO EXECUTIVE ORDER 2020-04**

NOW COMES Paul Maravelias (“Plaintiff”), *ex abundanti cautela*, and respectfully requests a 48-hour further extension of time to 3/29/20 to file his papers and pleadings in objection to Defendants’ 3/6/20 Motions to Dismiss, pursuant to FRCP 6(b)(1)(B) and LR 7.2(a).

1. Plaintiff’s Objection to the Defendants’ 3/6/20 Motions would have been due for ECF filing approximately two hours ago at 11:59pm on 3/27/20, pending this Court granting Plaintiff’s first request dated 3/20/20 for a 7-day extension to 3/27/20 due to COVID-19 pandemic-related travel disruptions, to which Defendants graciously assented on 3/24/20. *See* ECF Doc #21.

2. On 3/26/20, Governor Sununu issued Emergency Order #17 Pursuant to Executive Order 2020-04 entitled “Closure of non-essential business and requiring Granite Staters to stay at home”¹ to take effect the same moment Plaintiff’s above-referenced objections and memoranda were then due (to wit, 3/27/20 at 11:59pm EDT). As such, Plaintiff was overwhelmed with various preparatory responsibilities on short notice for his family with whom he predominantly resides,

¹ <https://www.governor.nh.gov/news-media/emergency-orders/documents/emergency-order-17-1.pdf>

for himself, and for others, including 1) preparing a virtual office for his father to work from home, 2) communicating with his employer about logistics, 3) telephonically assuring the preparedness and well-being of a medically at-risk friend, and 4) retrieving supplies in the spirit of the Governor's directive to minimize outside contact for the duration of the Emergency Order.

3. Plaintiff is *pro se* and incorporates by reference Paragraph ¶2 of his original request for extension of time (ECF Doc #21) stating various equitable grounds for the extension. Further, Plaintiff's failure to file the above-referenced pleadings before 3/27/20 at 11:59pm was "excusable neglect" under FRCP 6(b)(1)(B) due to the extenuating circumstances mentioned above.

4. As the requested 48-hour extension spans the weekend, it prejudices neither the defendants nor the Court's timely resolution of matters as the Court is presently closed until Monday 3/30/20. *See* FRCP 6(a)(1)(C); FRCP 6(a)(2)(c).

5. While still asserting his neglect was "excusable neglect" for purposes of FRCP 6(b)(1)(B), Maravelias nevertheless apologizes for his neglect and thanks all parties and the Court for their good faith and understanding. Plaintiff shall reciprocate by giving his automatic assent should either defendant(s) request any reasonable COVID-19-related extension of a deadline at any point hereinafter in the litigation of this action.

6. The 48-hour further extension of time requested to 3/29/20 would not result in the continuance of any hearing, conference, or trial. *See* LR 7.2(a).

7. Concurrence was not obtained given the short notice of the necessity of this motion. *See* LR 7.1(c). No separate memorandum of law is required in support of this objection as all relevant legal authority relied upon is cited herein. *See* LR 7.1(a)(2).

WHEREFORE, Plaintiff Paul Maravelias respectfully requests this Honorable Court:

- A. Grant Plaintiff's first 3/20/20 Motion for Extension of Time to 3/27/20 (ECF Doc #21);
- B. Grant Plaintiff a 48-hour further extension of time to 3/29/20 at 11:59pm to file an Objection and Memorandum in Support to each Defendant's 3/6/20 Motion to Dismiss; and
- C. Grant any further relief as may be deemed just and proper.

I, Paul Maravelias, declare that all factual stipulations within the foregoing Motion for Further Extension of Time are true and accurate to the best of my knowledge as of 3/28/2020 at 0550 UTC.

Dated: March 28th, 2020

Respectfully submitted,

PAUL J. MARAVELIAS, *pro se*

/s/ Paul J. Maravelias

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CERTIFICATE OF SERVICE

I, Paul Maravelias, certify that a timely provided copy of this document is being sent on this date to counsel of record for the Defendants pursuant to the rules of this Court by means of ECF filing.

/s/ Paul J. Maravelias

Dated: March 28th, 2020

Paul J. Maravelias